

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

CIVIL ACTION NO. 05-11664

LOUIS E. MCBRIDE, )  
 )  
Plaintiff )  
 )  
vs. )  
 )  
WOODS HOLE, MARTHA'S )  
VINEYARD AND NANTUCKET )  
STEAMSHIP AUTHORITY, AND )  
LAFLEUR CRANE SERVICE, INC., )  
 )  
Defendants )

**DEFENDANT, LAFLEUR CRANE SERVICE'S INITIAL DISCLOSURE**

Pursuant to Rule 26 of the Federal Rules of Civil Procedure, the defendant, LaFleur Crane Service, Inc., makes the following disclosures:

(1) Initial Disclosures

(A) The following individuals are likely to have discoverable information relevant to this matter:

1. Daniel Laprise, 202 Datmouth Street, Portland, Maine;
2. Lewis McBride, Adamsville, Rhode Island;
3. Al Chartier, 1 Broad Street, Nantucket, Massachusetts;
4. Jason Esposito, 1 Broad Street, Nantucket, Massachusetts;
5. Officer Christopher Carnevale, Nantucket Police Department, Nantucket, Massachusetts;
6. Kenny Decker, Nantucket Steamship Authority, Nantucket, Massachusetts.

(B) Copies of the following documents are within the possession, custody or control of the defendant.

1. Town of Nantucket Police Report.
2. Photographs of the accident locus;

(C) The defendant is making no claim for damages.

(D) The defendants agree to make available for inspection a copy of the insurance agreement with Safety Insurance.

(2) Disclosure of Expert Testimony

The defendant has not yet determined whether any expert testimony will be presented at the time of trial.

/s/

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John F. Gleavy, BBO 636 888  
Attorney for Defendant, LaFleur Crane Service, Inc.  
Lynch & Lynch  
45 Bristol Drive  
South Easton, MA 02375  
(508) 230-2500

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